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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems	)	MM Docket No. 87-268
and Their Impact upon the	)	
Existing Television Broadcast	)	
Service	)	

To: The Commission

FURTHER ENGINEERING SUPPLEMENT TO PETITION FOR RECONSIDERATION

Sierra Broadcasting Company ("Sierra"), the licensee of Television Station KRNV(TV), Reno, Nevada, by its attorneys, respectfully submits the attached Amendment to Engineering Statement ("Amendment") in support of its August 22, 1997 Supplement to Petition for Reconsideration in the above-referenced Digital Television proceeding. The amendment demonstrates that DTV Channel 9, if used at a location near Reno being developed as an antenna farm, could be substituted for the currently proposed DTV Channel 33, which, as Sierra has previously submitted, would result in a severe loss of service.

Accordingly, Sierra requests that the Commission reconsider its allocation of DTV Channel 33 to KRNV(TV) and replace it with DTV Channel 9.

Respectfully submitted,

SIERRA BROADCASTING COMPANY

By _____

James R. Bayes
Jerry V. Haines
of
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, D.C. 20006

Its Attorneys

Dated: September 5, 1997

AMENDMENT TO ENGINEERING STATEMENT

The following engineering statement has been prepared for Sierra Broadcasting Company, licensee of Television Station KRNV at Reno, Nevada and is an amendment to a previous statement prepared in support of their Supplement to the Petition for Reconsideration of the Commission's Sixth Report & Order.

In the previous engineering statement, it was requested that VHF channel 9 be alloted to Reno, Nevada to be paired with NTSC station KRNV. Part of that allocation would change the coordinates to 39° 18' 45" North, 119° 53' 00" West. That would place the new DTV station on Slide Mountain in an area being developed as an antenna farm through negotiations with the U.S. Forest Service and in cooperation with other broadcasters in the area.

The original statement proposed to have a complete study performed using the Longley Rice method contained in OET Bulletin No. 69. It has been discovered through discussions with numerous other engineering firms that it is quite difficult to get that entire study operating properly on computers other than the Commission's.

However, the engineering firm of du Treil, Lundin & Rackley has been successful in placing the Commission's program into service on their computer. A study was performed of the channel 9 allocation as proposed by Sierra Broadcasting Company. A copy of that study is attached.

It is noted that Sierra has proposed the use of a directional transmitting antenna to add extra protection to the proposed DTV allocation at Fresno, California. The attached maps indicate areas where interference would occur and the population in those areas has been totaled and is shown on the summary sheet. The effective radiated power for the study was 16.3 KW.

It is noted that the total DTV interference area is zero and the total DTV interference population is zero. There is some NTSC population interference. The total amount of such interference would be to 491 sq. kilometers containing a population of 2,932 people. That population primarily concerns KIXE(TV) on channel 9 and KQED on channel 9. However, both of those stations are at full spacing with regard to the required distance between new allocations for DTV stations as defined in the Sixth Report & Order. Therefore, that minor amount

of interference would have to be considered to be expected and to be acceptable. In particular, it is noted that interference to or from the digital allocation on channel 9 for KFSN(TV) would involve no area or population.

It is respectfully submitted that the attached study clearly demonstrates that the allocation of channel 9 to Reno, Nevada as its DTV allotment would neither cause nor receive interference with regard to the channel 9 allotment at Fresno, California which is paired with NTSC station KFSN(TV). Therefore, it is requested that the allotment of channel 9 be made to Reno for DTV use with KRNV(TV).

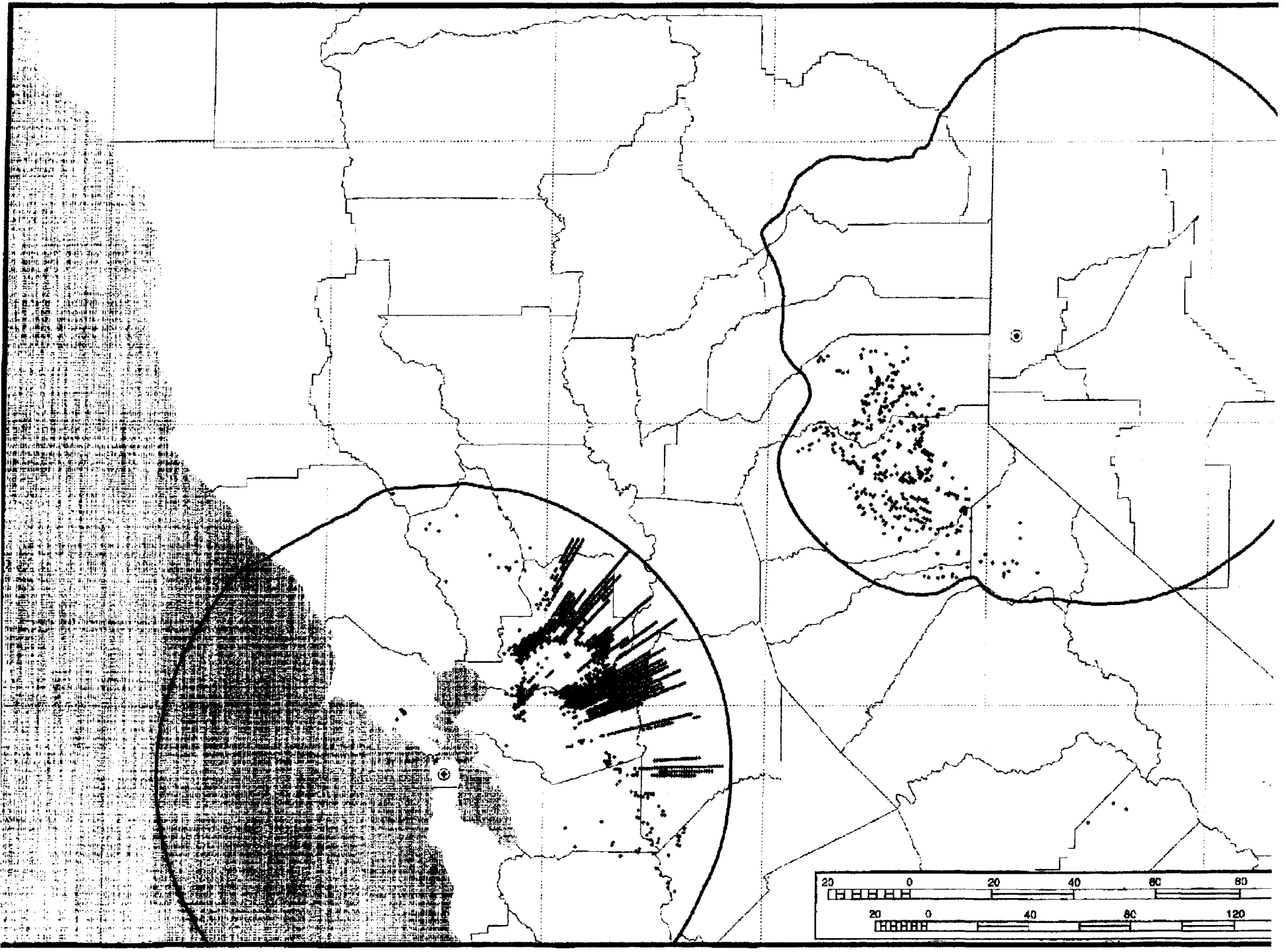
The preceding statement has been prepared by me or under my direction and is true and correct to the best of my knowledge and belief.

Donald L. Markley, P.E.

Subscribed and sworn to before me this 4th Day of September, 1997.

Notary Public

OFFICIAL SEAL
SHARON KAY DOTSON
NOTARY PUBLIC, STATE OF ILLINOIS
COMMISSION EXPIRES 3-25-2001


20
0
20
40
60
80
20
0
40
80
120

```
Study start time: 09:50:14
Using FCC error code processing
Interference RECEIVED
DKRNZTV 391845      1195300      9   16.30 kW  2925 m DA 90.00 % 36.00  dBu
WITHIN NOISE LIMITED CONTOUR
 Area     40503.45      sq. km.
 Pop        484071
NOT AFFECTED BY TERRAIN LOSSES
 Area     35676.63      sq. km.
 Pop        439997
******************************
Undesired
   KSBW 370330      1214633      8  158.00 kW  1227 m DA 10.00 % 56.00 dBu
INTERFERENCE
 Area    0.0000000E+00
 Pop              0
******************************
Undesired
    NEW 380422      1171316      9  316.00 kW  2182 m 10.00 % 56.00 dBu
INTERFERENCE
 Area     5.728628
 Pop              0
******************************
Undesired
 KIXETV 403609      1223901      9  115.00 kW  1910 m 10.00 % 56.00 dBu
INTERFERENCE
 Area     49.67140
 Pop            849
******************************
Undesired
   KQED 374520      1222705      9  316.00 kW   541 m 10.00 % 56.00 dBu
INTERFERENCE
 Area     469.5031
 Pop            2606
******************************
Undesired
   KXTV 381424      1213003     10  316.00 kW   597 m 10.00 % 56.00 dBu
INTERFERENCE
 Area    0.0000000E+00
 Pop              0
******************************
Undesired
DKFSNTV 370438      1192600      9    8.30 kW  1448 m DA 10.00 % 36.00 dBu
INTERFERENCE
 Area    0.0000000E+00
 Pop              0
******************************
Total ntsc ix area:     491.9460
Total ntsc ix pop :          2932
Total additional dtv ix area :    0.0000000E+00
Total additional dtv ix pop :               0
Total dtv ix area:    0.0000000E+00
Total dtv ix pop :              0
Study end time: 09:52:43
```

391845	Latitude
1195300	Longitude
2925	Trans. Height
meters	Height units
16.3	ERP
189	Frequency
9.1	Receiver Height
meters	Recv Height units
	Distance
1.0	Distance increments
km	Distance units
0	Begin az
359	End az
1	Azimuth increment
horizontal	Polarization
15.0	Permittivity
0.005	Conductivity
301.0	Climate factor
5	Climate code
90.0	Percent time
50.0	Percent Location
50.0	Percent confidence
1	Output Factor
40	DA Ref Azimuth
AND	DA Make
ATW-VHFS	DA Model
	Grid Width
	Grid Length
	North Boundary
	South Boundary
	East Boundary
	West Boundary
	North Distance
	South Distance
	East Distance
	West Distance
	Terrain dist units

```
lrDKRNZTV
lrDKRNZTV.out
      T       DA Input flag
      F  xtra bearings flag
      F    Print Input flag
      T    Radial type flag
      T    MIF/MIF out flag
      T   raw data out flag
      F  Boundary type flag
  1.000
   .997
   .989
   .974
   .950
   .916
   .870
   .811
   .740
   .657
   .571
   .490
   .430
   .405
   .415
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.485
.513
.523
.513
.485
.447
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.740
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DKRNZTV

Certificate of Service

I, Lorraine Handel, hereby certify that a copy of the foregoing Further Engineering Supplement to Petition for Reconsideration was delivered via first class, postage prepaid mail to the following this 5th day of September, 1997.

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